

CONTINGENCY PLAN AND EMERGENCY PROCEDURES

WAC 173-303-350 AND 173-303-360

MONSANTO CHEMICAL COMPANY
Seattle Plant

August 1986

MONSANTO CHEMICAL COMPANY
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ST. LOUIS, MISSOURI 63165
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CONTINGENCY PLAN

1 INTRODUCTION

WAC 173-303-350(1)

This section describes the Contingency Plan, including emergency procedures, that will be activated in the event of an unplanned, sudden, or nonsudden release of hazardous waste or hazardous waste constituents at the Monsanto Chemical Company, Seattle plant (see Figure 1). This plan is designed to minimize hazards to human health or the environment in the unlikely event of a fire, explosion, or release of hazardous wastes to the air, soil, or surface water at the Monsanto facility.

This procedure will go into effect immediately after declaration of an emergency such as a fire, explosion, or release of hazardous wastes by the Emergency Coordinator.

The Contingency Plan will be reviewed and amended if conditions change or if the plan fails under emergency conditions.

The primary purpose of this plan is to reduce or minimize potential injury to personnel, damage to property, and to the environment. Secondly, it is designed to document

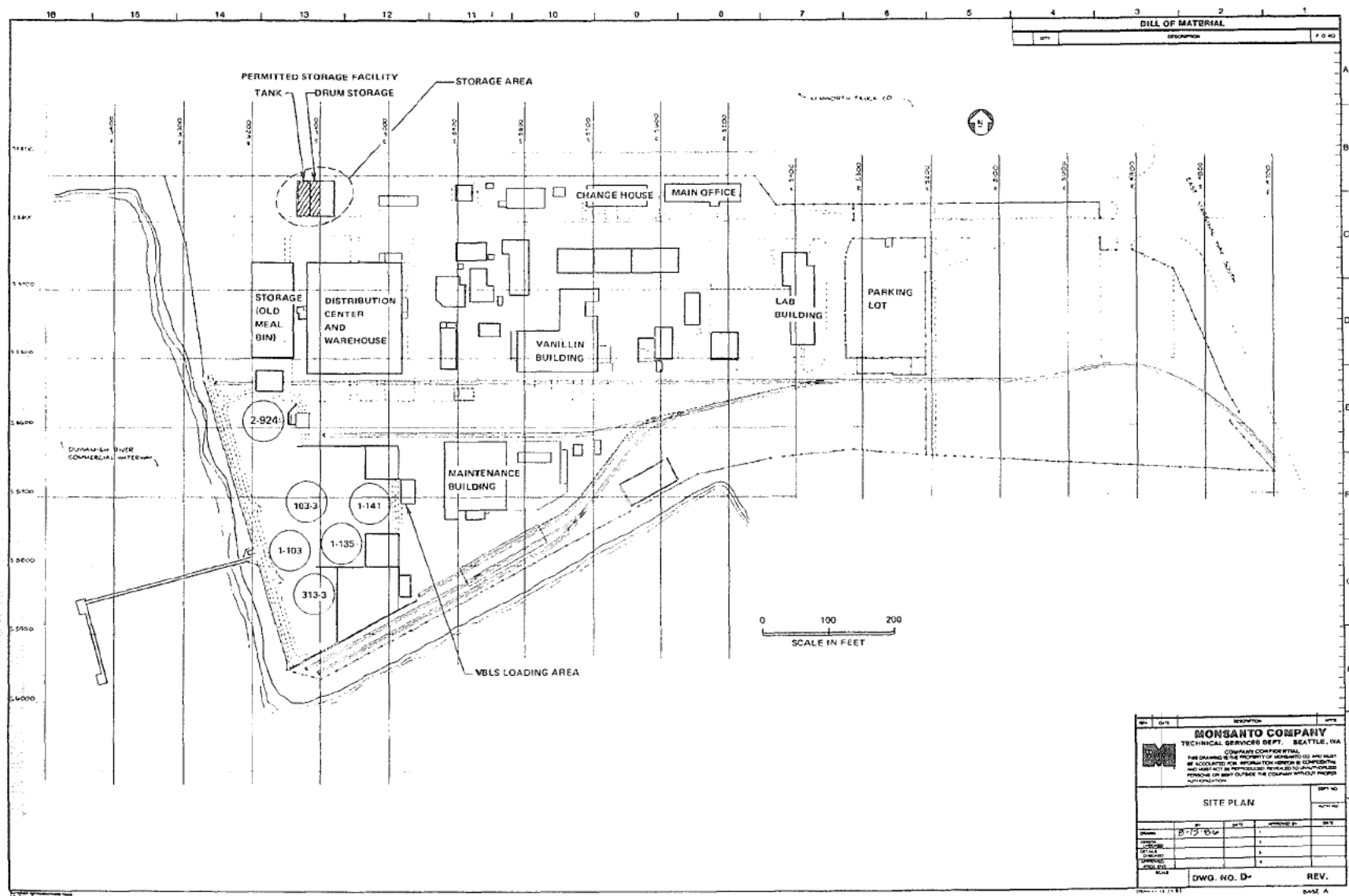


Figure 1

evidence pertinent to possible cause and effect of the incident, to facilitate investigation, to maintain a high degree of order during the incident, to assure effective response, and to coordinate outside assistance.

2 GENERAL INFORMATION

Name of Facility: Monsanto Chemical Company
Location: 9229 East Marginal Way South
Seattle, Washington 98108

Technical Services

Superintendent: Gary Podrabsky
206/764-4465

Type of Facility: The Seattle plant is a vanillin manufacturing plant.

Hazardous waste is typically stored or handled in two areas of the plant. The first is the RCRA interim status storage area consisting of an open tank and a drum storage area. The second is a loading area for Vanillin Black Liquor Solids (VBLS). Figure 1 shows the location of the two areas.

The hazardous waste that is stored in the RCRA facility is in a solid form, with the exception of occasional small

amounts of liquid solvent waste and mineral oil residues which are stored in drums. The storage area is completely contained and could hold up to 500 gallons of liquid should any drum develop a leak. The possibility of an unplanned release to the environment is therefore extremely remote. The most likely potential for a release would be runoff from the facility should the capacity of the collection system be exceeded. Possibility of excess runoff will be substantially diminished after the construction of an overhead canopy is completed in August of 1986. Figure 2 shows the storage area.

VBLS, a waste byproduct of the process, has a pH of approximately 13. The VBLS loading area is a location where VBLS is transferred from a nonwaste treatment process tank into tanker trucks for transport to an offsite TSD facility. The loading area is paved. Runoff from the area goes to a drain system which returns liquid to the process.

3 EMERGENCY COORDINATORS

WAC 173-303-350(d), -360(1), -360(2)(c)

The primary and alternate Emergency Coordinators (ECs) are appointed by position. The designated ECs are shown in Table 1. The alternate ECs are listed in the order in which they will assume EC responsibility as alternates.

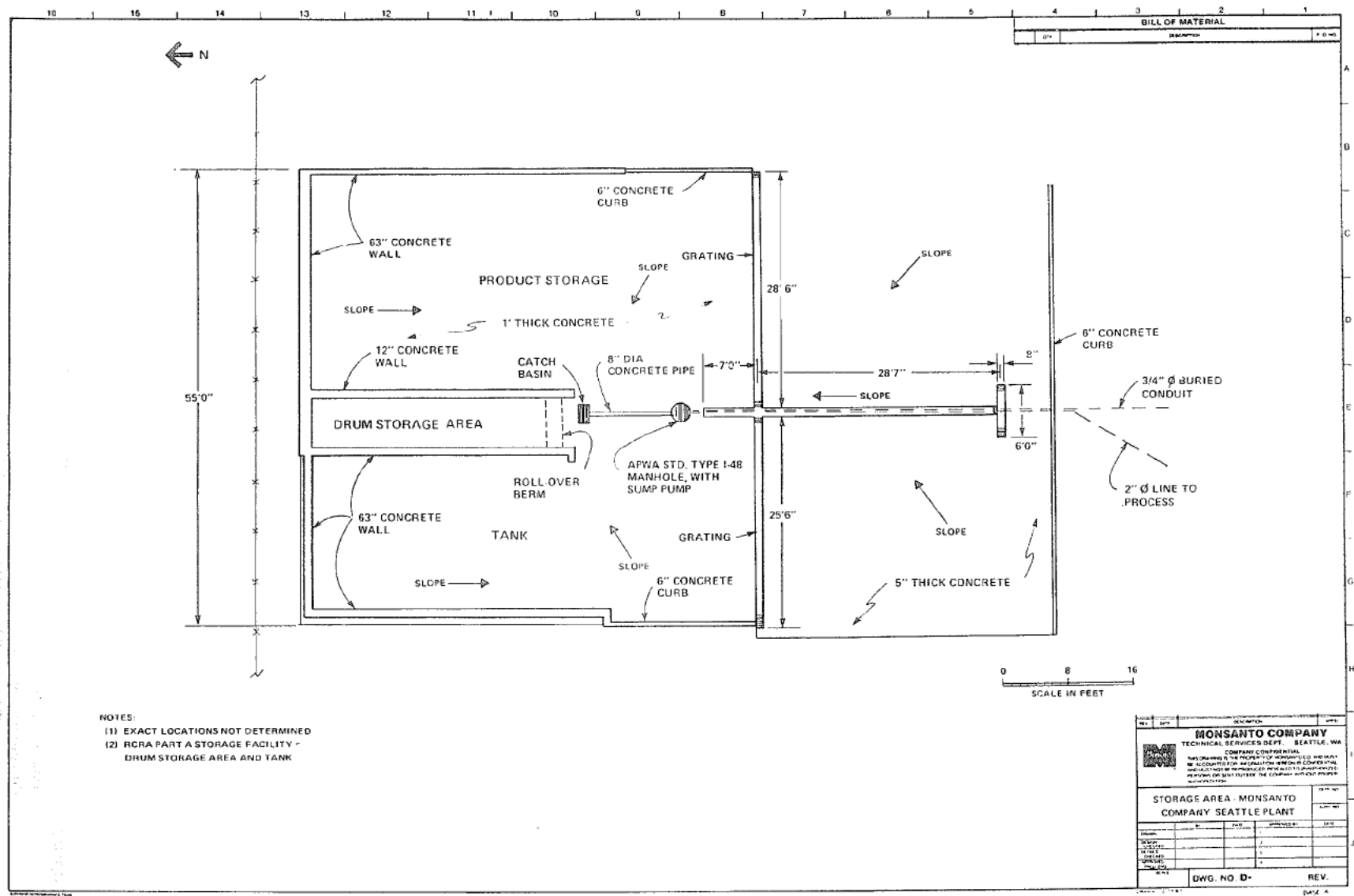


Figure 2

Table 1
EMERGENCY COORDINATORS

Emergency Coordinator	Phone Numbers	Home Address
<u>Primary</u>		
Title: Technical Services Supt.	wk: 206/764-4465	(b) (6)
Name: Gary Podrabsky	hm: (b) (6)	(b) (6), Washington (b)
<u>Alternates</u>		
Title: Environmental/Industrial Hygiene, Senior Chemist	wk: 206/764-4474	(b) (6)
Name: Sue Hays	hm: (b) (6)	(b) (6), Washington (b)
Title: Operations Supt.	wk: 206/764-4472	(b) (6)
Name: Bruce Pallante	hm: (b) (6)	(b) (6), Washington (b)
Title: Production Supervisor	wk: 206/764-4473	(b) (6)
Name: Dave Little	hm: (b) (6)	(b) (6), Washington (b)

If a fire, explosion, or accidental release of dangerous waste occurs, response activities will be initiated following observation of the event. An assessment of the situation will be performed immediately by the EC. Response activities will be directed as appropriate and the decision will be made whether or not to implement the Contingency Plan.

In the event of any emergency involving dangerous waste at the facility, the EC is to be contacted immediately. It is the EC's responsibility to coordinate emergency response efforts. The EC is familiar with the company's Contingency Plan, facility operations, nature and location of all

dangerous wastes at the facility, facility design and layout, and location of records. The EC has the corporate authority to commit the Monsanto Chemical Company's resources in the event of an emergency. Figure 3 presents Monsanto's authorization of this authority. If the primary EC is unavailable, the alternate EC has the same authority and responsibility.

The EC's comprehensive training in emergency response includes:

- o Emergency preparedness
- o Knowledge of the characteristics of the dangerous waste generated and handled at the facility
- o Knowledge of site evacuation plan
- o Effective use of safety equipment and communication devices
- o First aid
- o Fire fighting

If necessary, the EC will develop and maintain lines of communication with key community emergency services such as

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MONSANTO INDUSTRIAL CHEMICALS CO.
9229 East Marginal Way South
P. O. Box 80963
Seattle, Washington 98108
Phone: (206) 764-4450

Figure 3
MONSANTO CHEMICAL COMPANY
CERTIFICATE OF AUTHORITY

Monsanto Chemical Company hereby grants to the individual(s) designated as "Emergency Coordinator" for the control of regulated wastes in the approved Contingency Plan, authority to commit such resources of the Company as are needed to carry out the contingency Plan.

Date: August 15, 1986

David P. Alt
David P. Alt, Plant Manager
Monsanto Chemical Company

fire and police agencies, medical facilities, and emergency response units. During an emergency, the EC has authority to shutdown any operations within the Seattle facility if the operations are contributing or potentially may contribute to the emergency.

The EC is authorized to activate emergency response procedures by assembling equipment, determining its application, and implementing appropriate actions. Section 6 describes the emergency equipment available to the EC, both from onsite inventories and offsite resources.

The EC or his alternate will be responsible for the following types of actions as they pertain to dangerous waste incidents.

- o Implementing internal notification mechanisms
- o Identifying the waste type, source, volume, and extent of waste released
- o Assessing, to the extent practicable, potential direct, indirect, immediate and long-term effects on human health, and the environment
- o Directing notification of authorities if the Contingency Plan is implemented

- o Assessing the situation and requesting assistance as necessary
- o Directing initiation of containment, control, and clean-up procedures
- o Directing coordination of first-aid activities, if needed
- o Directing and activating the Evacuation Plan (Section 8), if appropriate
- o Taking necessary steps to prevent recurrence of an emergency situation
- o Preparing and submitting required reports

Facility personnel have been instructed to follow the EC's direction once the Contingency Plan has been implemented.

4 IMPLEMENTATION

WAC 173-303-360(2) (a)

The provisions of this plan will be carried out as soon as possible upon discovery of a fire, explosion, or release of

regulated wastes that have the potential for causing harm to the environment or public health.

In case of an imminent or actual emergency situation, the person observing the incident will implement the following procedure:

- o Ensure your own safety
- o Notify other personnel in the area of the emergency to ensure all personnel's immediate safety
- o Contact (telephone or as otherwise appropriate) the primary EC (or alternate) and report his or her name, location, and the nature and extent of the incident.
- o Based on verbal instructions from the EC (or alternate)
 - Immediately activate the plant emergency alarm.
 - Activate the ADT fire alarm, if appropriate.

- o Stay near the area, but safely away from the incident, to assist the EC upon arrival.

Only the EC, or his alternate, is authorized to implement the Contingency Plan after determining that such action is appropriate.

Based on the initial assessment of the situation by the EC, should the incident be of a minor or controllable nature that presents no apparent hazard to human health or the environment, the EC will implement the post-emergency procedures described in Section 5.8 and complete the necessary reporting described in Section 9.

When the decision has been made to implement the Contingency Plan, the Emergency Coordinator (or alternate) will set up a command post and take control of the affected area and any resources necessary until the emergency has been mitigated and necessary cleanup and restoration is completed. The Emergency Coordinator is responsible for directing the following activities:

- o Where necessary, see that processes or operations in the vicinity of the incident are shut-down or stabilized, and that any released waste is contained and collected in order to mitigate the

potential for fires or explosions occurring or spreading.

- o Determine the source and extent of the released materials and assess the direct and secondary hazards. General evaluation criteria that may be used by the EC to determine if the Contingency Plan is to be implemented are presented in Table 2.
- o See that any materials released from the incident area are isolated from potentially incompatible materials and see that these materials are removed from the area or appropriately contained.

5 EMERGENCY RESPONSE PROCEDURES

WAC 173-303-360(2)

5.1 NOTIFICATION AND RESPONSIBILITIES

WAC 173-303-360(2)(a)

Plant employees discovering a fire or dangerous waste release or other potential emergency situation that may directly or indirectly affect dangerous waste at the facility are instructed to immediately notify personnel in the immediate area who may be in danger, and the EC, respectively. The names, addresses, and telephone numbers of the Primary and

Table 2
EVALUATION CRITERIA FOR
IMPLEMENTATION OF CONTINGENCY PLAN

Dangerous Waste Fire or Explosion

- o Fire that may cause the release of toxic materials to air, water, or soil
- o Fire that may spread and could ignite dangerous waste at other locations onsite or offsite, or could cause heat-induced leaks or explosions
- o The use of fire suppressants, either chemicals or water, which could result in dangerous waste contaminated runoff
- o Dangerous waste explosion that has or could:
 - Result in danger from flying fragments or shock waves
 - Ignite other dangerous waste at the facility
 - Release toxic constituents

Dangerous Waste Spills or Releases

- o A spill occurring outside contained process or waste management areas
- o A spill that has or could release toxic vapors, or significant flammable liquids, or vapors, thus representing a fire or gas explosion hazard
- o A spill that could endanger human health or the environment for other reasons

Natural disasters do not of themselves constitute basis for implementation of this Contingency Plan; only if they result in a fire, explosion, spill, or release of dangerous waste will this Contingency Plan be implemented.

Alternate ECs are presented in Table 1 and are listed on the Emergency Action Summary page posted by telephones and on applicable bulletin boards.

Table 3 lists the persons or agencies whom the EC may need to notify during an emergency.

All personnel reporting information to an outside response group will do so only at the direction of the EC. The person making such notification will provide the following information:

- o His or her name and telephone number
- o Name and address of facility
- o Time and type of incident (e.g., discharge, fire)
- o Name and quantity of material(s) involved, to the extent known
- o Extent of injuries, if any
- o Possible hazards to the environment and human health outside the facility

Table 3
EMERGENCY NOTIFICATION
OUTSIDE RESPONSE GROUPS

<u>Type of Emergency</u>	<u>Contact</u>	<u>Telephone Number(s)</u>
Fire/Explosion	o Duwamish Fire District No. 1	206/852-2121 or 911
Hazardous Material Spill or Release to the Environment (Quantity Greater Than the Reportable Spill Quantity)	o National Response Center	800/424-8802
All of the Above	o Washington Department of Ecology, Olympia, Washington	206/459-6000
Injury	o Providence Hospital Emergency Room	206/326-5691
	o Dr. Brad Harris, Plant Physician	206/329-1760
	o Harborview Hospital (for major burns)	206/223-3000
	o National Poison Control Center (if necessary)	404/588-4400
	o King County Sheriff	206/344-4080 or 911

Give the following information to the notified agencies and authorities as directed by the EC:

- o Your name and telephone number
- o Name and address of the facility
- o Time and type of incident (e.g., release, fire)
- o Name and quantity of material involved, to the extent known
- o The extent of injuries, if any
- o Possible hazard to human health or the environment, outside the facility

This information list may be expanded at the discretion of the EC.

Additional organizations capable of emergency assistance are listed in Table 4.

5.2 IDENTIFICATION OF HAZARDOUS MATERIAL

WAC 173-303-360(2) (b)

As soon as possible, the EC will determine the character, source, amount, and extent of any released materials by visual inspection, previous sample analyses, past manifests, location of the incident within the plant, and other available sources of information.

Initial identification may include the following parameters:

- o Origin of the leak or spill
- o Condition of the source, for example, repairable leak, uncontrollable leak, easily moved, unmovable
- o Physical state identification, for example, solid (powder, pellet, granular), liquid, or gas

Table 4
ORGANIZATIONS CAPABLE OF EMERGENCY ASSISTANCE

Organization	Phone	Capabilities
Crosby & Overton 3406 13th SW Seattle, Washington	622-3400	Oil spill cleanup, sludge removal, tank trucking.
Foss Launch & Tug Company 660 West Ewing Seattle, Washington	281-3800 281-2810 ^a	Log booming equipment; barges available to provide temporary floating storage.
Chem Security Systems, Inc. P.O. Box 1866 Bellevue, Washington	872-0711	Disposal service for waste materials via Arlington, Oregon.
Crowley Environmental Services 3400 E Marginal Way South Seattle, Washington	682-4898	Emergency pollution control for spill cleanup on land or water.
Northwest Environmental Services 1500 Airport Way South Seattle, Washington	622-1090	Oil spill cleanup, sludge removal, tank trucking.
Chemical Processors, Inc. 5501 Airport Way South Seattle, Washington	767-0350	Chemical waste recyclers, and handlers.

^aAfter hours number, for emergency use only.

- o Odor, if noticed, such as almond, ammonia, benzene, vinegar, sulfur, skunk, onion, sharp, biting, cleaning fluid, or paint
- o Color of material
- o Noticeable reaction, for example, fuming, flaming, or gas evolution

5.3 ASSESSMENT

WAC 173-303-360(2)(c) and (d)

After the materials have been identified to the extent possible, the EC will assess possible hazards, both direct and indirect, to human health or the environment, and subsequently notify the appropriate site personnel and authorities.

The EC's hazard assessment may include information gathered from other site personnel. The evaluation criteria used by the EC to determine if the Contingency Plan is to be implemented were previously shown in Table 2.

Based on the EC's knowledge of the existing conditions, the EC may take the following actions, if necessary:

- o If facility personnel cannot control the emergency, the EC will identify and notify the appropriate federal, state, and local agencies.
- o If site evacuation is necessary, the EC will activate the Evacuation Plan (Section 8). If partial evacuation is required, the EC will designate the affected areas and the location of the onsite re-grouping area.
- o If evacuation of the off-site local area is advisable, the EC will communicate necessary information to the King County Sheriff or Duwamish Fire District (911).
- o The EC will immediately notify the WDOE (459-6000), and the government official designated as the on-scene coordinator, or the National Response Center [(800) 424-8802].

5.4 CONTAINMENT AND CONTROL PROCEDURES

WAC 173-303-360(f)

The facility's operations are designed to minimize the potential hazards to facility personnel and to contain spilled or leaked materials and prevent their movement from the facility. In the case of a spill, two or more people with

shovels may construct a temporary berm around the affected area using dirt and sandbags available onsite. None of the wastes in the storage area have been identified to be ignitable or reactive wastes.

5.5 PREVENTION OF RECURRENCE OR SPREAD OF FIRES, EXPLOSIONS, OR RELEASES

WAC 173-303-360(2)(f) and (g)

The EC will take all necessary steps to mitigate the potential that a release, fire, or explosion does not occur, recur, or spread to other hazardous waste at the facility after an initial incident. Procedures that may be carried out include:

- o Inspection for any leaks or cracks
- o Inspection of equipment
- o Isolation of collected waste materials

Any operation that was initially shut down during response to the incident will not be reactivated until the EC gives a "go-ahead" signal.

5.6 STORAGE AND TREATMENT OF RELEASED MATERIAL

WAC 173-303-360(h)

Once the emergency situation has ended, the EC will initiate cleanup and disposal of the residues. This will occur as soon as possible after a release, fire, or explosion in order to minimize the potential for further contamination or incident recurrence.

5.7 INCOMPATIBLE WASTE

WAC 173-303-360(2)(i)(i)

The EC will ensure that, in the affected area(s) of the facility, no waste that may be incompatible with the released material is stored in the area until cleanup procedures are completed.

Although the EPA guidance document, A Method for Determining the Compatibility for Hazardous Wastes, (EPA-600/2-80-076, April 1980) shows that strainer solids and waste methylene chloride are potentially incompatible (see Waste Analysis Plan), the two have been mixed together regularly in the onsite Monsanto Laboratory since 1964 with no observed incompatibilities.

Therefore, the likelihood of incompatible wastes coming into contact with each other is remote.

5.8 POST-EMERGENCY ACTIVITIES AND EQUIPMENT MAINTENANCE

WAC 173-303-360(2) (i) (ii)

After cleanup procedures are completed, the EC will determine that all equipment used during the cleanup will be decontaminated and readied for future use. Fire extinguishers will be recharged, personnel protective equipment replaced, and absorbent materials restocked. Before operations can be resumed, an inspection of all safety equipment will be conducted.

5.9 POST-EMERGENCY NOTIFICATION

WAC 173-303-360(2) (j)

The EC or his designee will notify WDOE and appropriate local authorities when cleanup procedures are completed and emergency equipment has been cleaned (Sections 5.7 and 5.8). This notification will occur before operations are resumed in the affected area(s) of the facility.

6 EMERGENCY EQUIPMENT

WAC 173-303-350(3) (e)

Because of the nature of the Seattle plant and the volume of liquid chemical products produced, Monsanto maintains numerous types of routine maintenance and emergency equipment

onsite for process operations. In the event of an emergency involving the RCRA interim status facility or waste generating areas, plant equipment and materials that may be used for spill control and cleanup include absorbents, shovels, drums, overpack containers, maintenance supplies, various respirators, and various decontamination equipment. Commercially available absorbents are highly absorbent materials that are used to control spills and assist in cleanup by changing liquid spills into semisolid materials. Shovels can be used to clean up spills that have been controlled using absorbents, site soils (temporary berms), or sand bags.

The facility maintains an alarm and communication system, equipment onsite suitable for emergency response, and accessibility to offsite resources. The onsite equipment is primarily maintained for process operations and will enable facility personnel to react and respond to reasonably foreseeable emergency incidents that may arise. If needed, supplemental emergency equipment supplies may be available from outside sources. A list of onsite emergency equipment maintained for process operations that would be available for dangerous waste incidents is located in Table 5. The figures in Appendix A show the general locations of fire extinguishers and foam, fire hydrants, ADT fire alarms, first aid kits, first aid stations, breathing air compressor and stations (for supplied air respirators), dust filter

Table 5
 ONSITE EMERGENCY EQUIPMENT^a

Quantity ^b	Description	Location ^c	Capabilities
5	Shovels	Maintenance Shop, TSD Facility	
20	Sandbags	Maintenance Shop, D.C. Warehouse	
4	2 inch Warren-Rupp "Sandpiper" air-operated diaphragm pump	Maintenance Shop	Maximum air pressure 125 psi. Maximum capacity 200 gallons per minute Can be pulled by forklift
1	500-gallon portable stainless steel tank with dip pipe and flame arrester		
12	Fire hydrants ^d	Throughout Plant	
1	Deluge system ^d		On MVR unit
4	Dry pipe sprinkler systems ^d	On 300 and 400 Extraction Towers, Distribution Center, Maintenance Shop	
5	Wet pipe sprinkler systems ^d	200 area, 500/600 area, D.C. Warehouse (2), Maintenance Shop	
2	Foam and eductor nozzles ^d	D.C. Warehouse	
123	Fire extinguishers ^d	Throughout Plant	Two are halon, remainder are ABC type
50-100	Oil-absorbing sheets	D.C. Warehouse	
2	Drum transfer pumps	Maintenance Shop	Hand operated
6	Empty open top metal drums	Meal Bins	17C or E
2	Drum overpacks	Meal Bins	

^a This equipment is maintained onsite for production processes and is available in the event of a spill of hazardous waste.

^b Quantities indicated are nominal inventories only. Actual onsite inventories may deviate from that indicated.

^c D.C. = Distribution Center.

^d See figures in Appendix A for locations.

respirators, storage, cartridge respirator storage (including Scott air packs), safety showers, eye wash stations, and emergency radio stations. A list of available offsite emergency equipment and services is located in Table 6.

7 ARRANGEMENTS WITH LOCAL AUTHORITIES

WAC 173-303-350(3)(c), (4), AND 360(j)

The EC will contact the local and regional entities and authorities who may be involved in an emergency situation prior to an emergency situation. Each of these authorities will be given a copy of the Contingency Plan and relevant background information. Discussions regarding their specific involvement and coordination will be held. These arrangements will be confirmed in writing and copies will be provided to all parties. Such contemplated agreements are listed in Table 7.

A copy of the Contingency Plan and any revisions will be maintained in the Technical Services Superintendent's office at the facility. Monsanto will provide copies of the Contingency Plan to relevant local authorities and organizations, as well as to company ECs such that all emergency responses will be coordinated effectively and procedures followed as outlined in the Plan.

Table 6
OFFSITE AVAILABLE EMERGENCY EQUIPMENT

<u>Description</u>	<u>Company/Location</u>	<u>Phone</u>
Pumps, compressors, generators, trucks, loaders, backhoes, etc.	Hertz Equipment Rental and Leasing 10710 E. Marginal Way South Seattle, Washington	206/762-1863
Pumps, compressors, generators, etc.	Star Rentals 1919 4th Avenue South Seattle, Washington	206/622-7880
Bulldozers, backhoes, loaders, earth-moving equipment, etc.	Case Power and Equipment Co. 5701 1st Avenue South Seattle, Washington	206/762-7110
Tank trucks, flat beds.	Arrow Transportation Co. 6737 Corson Street Seattle, Washington	206/767-3605
Flat beds, dump trucks.	Secured Resource Transport 12486 SE 93rd Clackamas, Oregon	503/653-5222
Bulldozers, backhoes, loaders, earth-moving equipment, etc.	N.C. Machinery Company 17025 West Valley Highway Seattle, Washington	206/251-5800
Tank trucks	Matlack Incorporated 19929 76th Avenue South Kent, Washington	206/872-8925

Table 7
PROPOSED COORDINATION AGREEMENTS

To ensure that any onsite emergency requiring outside assistance is responded to in a timely and effective manner, Monsanto will communicate with the following response departments and define responsibilities with each group. Note that all organizations will receive a copy of this contingency plan.

Principal Departments:

1. KING COUNTY FIRE DEPARTMENT, Duwamish Fire District 1

Contact: 852-2121

- o Department will be invited to visit the facility annually.

2. KING COUNTY SHERIFF

Contact: 344-4080

- o Department will be invited to visit the facility annually.

Other Departments:

1. Providence Hospital
2. Washington State Department of Ecology

7.1 EMERGENCY RESPONSE AGENCIES

The King County Fire Department will be asked to review the Contingency Plan and be requested to provide a supporting role in facilitating the movement of emergency personnel and equipment and to take the lead in the evacuation of areas surrounding the site, as necessary. Fire department personnel will also be provided briefings on the materials handled at the facility, hazard identification, and first-aid procedures.

The King County Sheriff will be given a copy of the Contingency Plan and will be invited annually for a tour of the facility to discuss specifics of the emergency response procedures.

7.2 CASUALTY CONTROL AGENCIES

The following medical facilities and individual will be notified of potential hazards that could occur at the site and will be given a copy of this Contingency Plan:

Providence Hospital	326-5691
Harborview Hospital	223-3000
Dr. Brad Harris, Plant Physician	329-1760

Dr. Harris and personnel from these facilities will be advised of hazardous wastes handled at the facility and will be provided hazard identification and treatment information.

8 EVACUATION PLAN

WAC 173-303-350(3)(f)

The EC (or the Alternate EC) is authorized to call for a partial or complete evacuation of the site in response to an emergency situation involving hazardous waste that threatens the health and safety of facility personnel. The EC may take this action based upon personal analysis of the situation or at the request of an on-scene public emergency services coordinator such as a sheriff or fire chief.

8.1 SITE ACCESS AND EGRESS

Evacuation routes from the facility are shown in Figure 4.

The site is designed and operated to facilitate access to all points across the site for inspection and emergency response. The assembly area for the plant is the southwest corner of the parking lot. One person will be assigned to write down the names of all assembled and give it to the EC for an accounting of plant personnel.

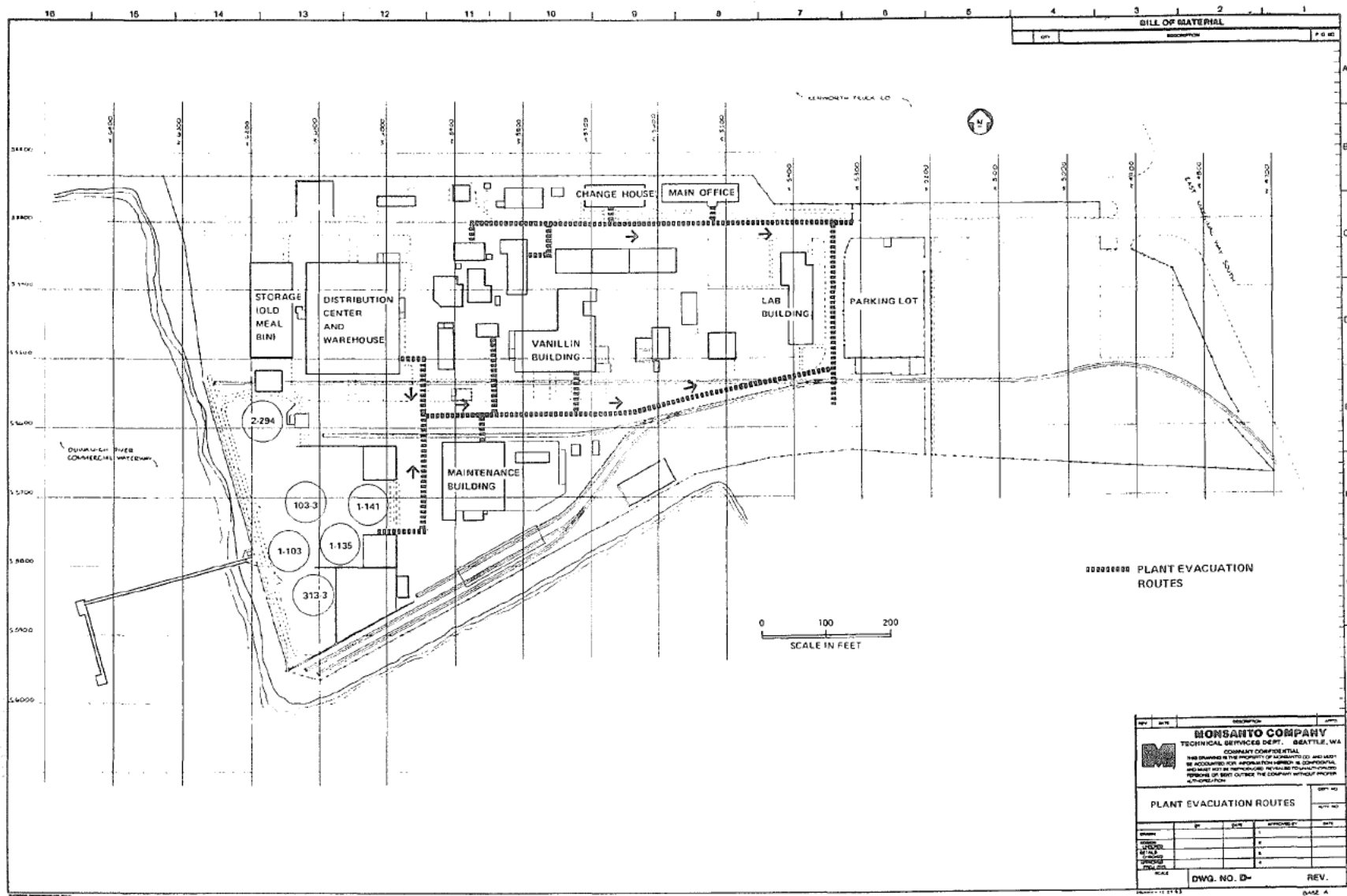


Figure 4

Since facility access is normally restricted, security will be maintained during an emergency, except for persons assisting in the response efforts. A detailed enumeration of personnel admitted to the site during an emergency will be maintained. To maintain security, access points to the site used during an emergency situation will be continuously monitored, to the extent possible.

Procedures for the evacuation of the site and surrounding areas are detailed in the following section.

8.2 EVACUATION PROCEDURES

The following actions will be taken when the EC orders a site evacuation:

1. The plant emergency alarm system will be activated to signal the evacuation. It is an ascending low to high whoop which automatically repeats itself. It is broadcast over the plant breathing air loudspeakers and horns. The system also has a built-in paging capability to transmit voice instructions.
2. The EC or designee will activate emergency services by calling the King County Sheriff and the King County Fire District for assistance, reporting on the situation, and arranging for their emergency care. The EC

will coordinate activities with the sheriff and fire departments.

3. The EC or designee will determine which gates will be used depending upon the location of the incident, wind direction, and personnel.
4. All personnel, including visitors and contractors, will immediately leave through the exit gates designated by the EC.
5. Evacuation will proceed as follows:
 - o If downwind of incident, evacuate perpendicularly to wind direction over the most accessible route.
 - o If upwind of incident, evacuate in upwind direction.
6. Personnel will regroup in the southwest corner of the parking lot.
7. All attempts to rescue or find persons unaccounted for will be directed by the command office of the EC assisted by the police, sheriff, or fire department, if present.

8. No one shall re-enter the facility until authorization has been given by the EC.

8.3 COMMUNITY IMPACT CONSIDERATIONS

In anticipation of the possibility, although extremely remote, that areas adjacent to or near the site may be endangered due to a fire, explosion, spill, or dangerous waste release onsite, a Monsanto representative will have discussed procedures for evacuating the surrounding areas with local authorities. Consistent with these discussions, the following responsibilities have been determined:

- o The EC will notify the local authorities of the possible need to evacuate offsite areas. This need will depend on the nature, extent, and rate of spread (including direction) of potential hazards to surrounding areas.
- o Until local units can respond, facility personnel will, under the EC's direction, initiate roadblocks and evacuation procedures for areas adjacent to the site.
- o The EC will maintain communications with local authorities and assist in the coordination of

evacuation, emergency response, and casualty control activities.

8.4 REOCCUPANCY OF FACILITY

The determination of when the facility may be safely reoccupied will be made by the EC in consultation with responding emergency services agencies. Site activities will only resume after the EC has given a "go-ahead" notification.

9 INCIDENT REPORTING

WAC 173-303-360 (2) (k)

The owner or operator will note in the operating record the time, date, and details of an incident that requires implementing the Contingency Plan. Within 15 days after the incident, he will submit a written report to the WDOE in accordance with 40 CFR Part 265.56(j). Reports are to be sent to:

Washington Department of Ecology
Attn: Dangerous Waste Division
Mail Stop PV-11
Olympia, Washington 98504

A file of all reports submitted will be maintained at the plant site until closure of the facility.

The report will contain the following items:

1. Name, address, and telephone number of the owner or operator
2. Name, address, and telephone number of the facility
3. Date, time, and type of incident (e.g., fire, explosion)
4. Name and quantity of material(s) involved
5. Extent of injuries, if any
6. Assessment of actual or potential hazards to human health or the environment, where this is applicable
7. Estimated quantity and disposition of recovered material that resulted from the incident
8. Specify to whom reported and when reported.

Additional government authorities are listed in Table 8.

Table 8
GOVERNMENTAL AUTHORITIES NOTIFICATION LIST

Agency	Phone	
	Days	Night/Weekends
Washington State Department of Ecology		
Mike Dawda	885-1900	
Bob McCormick, Regional Manager		(b) (6)
Metro (Industrial Waste Section)	447-6743	622-1628
Metro (West Point Treatment Plant)	447-6803 (24 hours)	
National Response Center (spills to Duwamish River and hazardous reportable quantity spills only)	800-424-8802 (24 hours)	
U.S. Coast Guard	442-7070	442-7070
King County Fire District No. 1	762-3330 (Business) 911 (Emergency)	762-3330 (Business) 911 (Emergency)
Environmental Protection Agency	442-1263	442-1200
U.S. Army Corps of Engineers	764-3690	764-1628
King County Office of Emergency Service- Emergency Only	911	911
King County Sheriff, Emergency Number	911	

For incidents that involve reportable quantity releases of regulated wastes from the storage area to the environment (i.e., not contained within a secondary containment device (very unlikely) in which the Contingency Plan is not implemented (e.g., minor emergencies) Monsanto maintains documentation, notifies the National Response Center, and prepares appropriate reports, in accordance with Table 302.4--List of Hazardous Substances and Reportable Quantities (40 CFR 302.4) and Section 102 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA).

10 AMENDMENTS TO CONTINGENCY PLAN

WAC 173-303-350(5)

This Contingency Plan is subject to review and amendment by the EC if:

- o Applicable regulations are revised.
- o The Plan fails in an emergency.
- o The facility permit is revised.
- o The facility changes in design, construction, operation, maintenance, or if other circumstances

develop that materially increase the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or changes in the response necessary in any emergency.

- o The list of Emergency Coordinator and his Alternate changes.
- o The list of emergency equipment changes substantially.

When the Contingency Plan is amended for any reason, each area amended will be reviewed and discussed with appropriate agencies or emergency response authorities. New Contingency Plan documents will be prepared and distributed to appropriate local, state, and federal agencies, and to facility personnel responsible for its implementation.

EMERGENCY ACTION SUMMARY PAGE

In the event of an observed spill, call one of the following persons. Begin at the top of the list. This person is the emergency coordinator and will determine which agency notifications to make. If personal injury has occurred, see below.

EMERGENCY COORDINATORS

Emergency Coordinator	Phone Numbers	Home Address
Primary:		(b) (6)
Title: TSD Superintendent	Work: 206/764-4465	
Name: Gary Podrabsky	Home: (b) (6)	
Alternates:		
Title: Environmental/Industrial Hygiene, Senior Chemist	Work: 206/764-4474	
Name: Sue Hays	Home: (b) (6)	
Title: Operations Superintendent	Work: 206/764-4472	
Name: Bruce Pallante	Home: (b) (6)	
Title: Production Supervisor	Work: 206/764-4473	
Name: Dave Little	Home: (b) (6)	

AGENCIES AND INSTITUTIONS THAT MAY BE NOTIFIED
IN THE EVENT OF A RELEASE OF REGULATED WASTES

In the event of personal injury or other emergencies, contact the following as appropriate:

Hospitals: Providence Hospital Emergency Room 326-2121
Harborview Hospital (for major burns) 223-3000
Dr. Brad Harris, Plant Physician 329-1760

Fire Departments: King County (Duwamish Fire Dist. #1) Primary 852-2121
City of Seattle 911

Police Departments: King County Sheriff 344-4080
Seattle 911

The Emergency Coordinator will assess the extent of the emergency and determine the notification requirements for the following:

National Response Center: 800/424-8802

Regulatory Agencies

U.S. Environmental Protection Agency, Region X 206/442-1200
Washington Department of Ecology 206/885-1900

Appendix A
SAFETY EQUIPMENT LOCATIONS

